

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CAROL ALVAREZ

Case No. 1:24-CV-24135-JEM

*Plaintiff,*

v.

GOAT HOSPITALITY GROUP LLC,  
and WGOAT15 LLC,

*Defendants.*

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**DEFENDANTS' PARTIALLY UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

COMES NOW, DEFENDANTS, GOAT HOSPITALITY GROUP LLC ("GOAT"), and WGOAT15 LLC ("WGOAT15") (collectively "DEFENDANTS"), by and through undersigned counsel, respectfully move this Honorable Court for this partially unopposed enlargement of time to respond to PLAINTIFF'S, CAROL ALVAREZ ("PLAINTIFF"), Complaint and states in support as follows:

1. On October 24, 2024, PLAINTIFF filed her Complaint alleging employment discrimination in violation of Title VII of the Civil Rights Act, 42 U.S.C. § 2000e ("Title VII"); the Pregnant Workers Fairness Act, 42 U.S.C. § 2000gg ("PWFA"); the Florida Civil Rights Act of 1992, § 760.01, Florida Statutes ("FCRA"); and the Miami-Dade County Human Rights Ordinance, Miami-Dade County, Fla., Code, ch. 11A, art. IV, § 11A-26 ("MDHRO") against DEFENDANTS. [D.E. 1].

2. On January 2, 2025, PLAINTIFF served GOAT with the Complaint. [D.E. 4]. GOAT's response, without extension, is due on or before January 23, 2025.

3. On January 14, 2025, PLAINTIFF served WGOAT15 with the Complaint. [D.E. 5] WGOAT15's response, without extension, is due on or before February 4, 2025.

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4. The undersigned counsel represented the DEFENDANTS in the administrative phase but was not contacted by PLAINTIFF'S counsel to waive service. If offered the option to waive service, DEFENDANTS would have agreed to do so and been granted sixty (60) days to respond to the Complaint. *See* FRCP 4(d)(3). DEFENDANTS require additional time to meaningfully prepare a response for both DEFENDANTS, concurrently.<sup>1</sup> Further, counsel for DEFENDANTS and PLAINTIFF commenced settlement discussions.

5. DEFENDANTS, GOAT HOSPITALITY GROUP LLC and WGOAT15 LLC, hereby respectfully request an enlargement of sixty (60) additional days from the last response due, January 14, 2025, to respond to PLAINTIFF'S Complaint, or on or before March 17, 2025.

6. PLAINTIFF does not oppose the request for extension of time. However, PLAINTIFF only agrees to a thirty (30) day extension of time for DEFENDANTS to respond to the Complaint.

7. DEFENDANTS make this Motion in good faith and not for the purpose of delay; the requested enlargement of time will not prejudice PLAINTIFF.

WHEREFORE, DEFENDANTS, GOAT HOSPITALITY GROUP LLC and WGOAT15 LLC, respectfully request this Honorable Court enter an order granting this Motion, providing DEFENDANTS an extension of time through, and including, March 17, 2025, to respond to PLAINTIFF'S Complaint, and grant such other and further relief as this Court deems just, equitable, and proper.

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<sup>1</sup>DEFENDANTS are not related entities and have distinct defenses, which may differ. However, to the extent possible, DEFENDANTS will jointly file any documents which can be filed jointly.

**CERTIFICATION UNDER LOCAL RULE 7.1(a)(3)**

Pursuant to Local Rule 7.1(a)(3), I hereby certify that I, Tara E. Faenza, Esq., counsel for DEFENDANTS, GOAT HOSPITALITY GROUP LLC and WGOAT15 LLC, conferred with all counsel of record; PLAINTIFF'S Counsel indicates he does not oppose the relief sought in concept, but does object to extensions beyond thirty (30) days.

DATED: January 22, 2025

Respectfully submitted,

**PATHMAN LAW, LLC**

*Counsel for Defendants GOAT HOSPITALITY  
GROUP LLC and WGOAT15 LLC*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 22, 2025 a copy of the foregoing was served on all counsel of record identified on the Service List below via CM/ECF.

By: /s/ Tara E. Faenza, Esq.

TARA E. FAENZA, ESQ.

**Service List**

**Kyle T. MacDonald, Esq.**

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